Attachment R -
Reston Area HQ
Maintenance Yard

VDOT MS4 (General Permit No. VAR04)
Reston Area Headquarters
VDOT District No. 9

Facility Name: Reston Area Headquarters
Location: 10907 Sunset Hills Road, Reston, VA, 20190
Latitude: N 38.947031* **Longitude** W 77.319551*

Date of Visit: October 24, 2012
Entry Time: 8:45 a.m. (approx)
Exit Time: 12:00 p.m. (approx)

Site Owner and/or Operator: VDOT – Northern Virginia District

Site Contact: Larry Humphries (Maintenance Manager, VDOT)

Conducted by: Max Kuker (PG Environmental, LLC), Anthony D'Angelo (PG Environmental, LLC), Allison Graham (U.S. EPA Region 3), Pete Gold (U.S. EPA Region 3), and Liz Ottinger (U.S. EPA Region 3)

Accompanied by[1]**:** Mason Harper (MS4 Permit Writer, Virginia DCR), Morris Walton (Roadside, VDOT), Tracey Harmon (Water Quality Permits Supervisor, VDOT), David Wilson (HAZMAT Compliance Manager, VDOT), Larry Humphries (Maintenance Manager, VDOT), Tim Henson (TO III, VDOT), Tony Cole (TO II, VDOT), Lee Hixon (Consultant, EEE Consulting, Inc.), and Chris Swanson (Consultant, EEE Consulting, Inc.)

Site Visit Report Prepared by: Anthony D'Angelo (PG Environmental, LLC)

On October 24, 2012, the EPA Inspection Team conducted a site visit at the Reston Area Headquarters (hereinafter, Facility). Dry weather conditions were experienced throughout the inspection activities. Weather history reports from the National Oceanic and Atmospheric Administration station Washington Dulles Intl AP 44-8903 indicated that on 10/19/2012, 0.03", and on 10/18/2012, 0.40" and on 10/15/2012, 0.26" of precipitation occurred.

Based on a review and comparison of this site visit location and the United States Census 2000 Urbanized Area designation, it was determined that the Facility is located within the MS4 Compliance Area. The Facility comprises multiple buildings (e.g., office buildings, vehicle maintenance building, and storage buildings), a vehicle fueling island, a bulk fueling station, vehicle/equipment storage areas, and materials storage. Various activities are conducted at the Facility, including the following: vehicle washing, storage, minor repair, and fueling; salt/sand/brine storage, and snow removal equipment storage. Facility staff explained that the majority of maintenance performed on Facility vehicles is done at the VDOT West Parcel Camp 30 Maintenance Shop at 4726 West Ox Road, Fairfax VA. Stormwater runoff from the Facility is primarily conveyed to multiple points of discharge along the south/southeastern and western perimeter of the site. Stormwater runoff from the eastern portion of the site discharges off site at the southeastern corner of the Facility into the Dulles Toll Road Right-of-Way, south of the Facility.

[1] Sign-in sheets for the site visit are provided after the photograph log.

Stormwater runoff from the west side of the Facility discharges to a wetland located to the west of the Facility. A storm water basin maintained by the Virginia Toll Road Authority is located directly to the southwest of the Facility; however, according to Facility personnel, it does not receive any storm water runoff from the Facility. There is an on-site salt pond that receives stormwater runoff from storm drain inlets on the interior of the site, which is pumped into the sanitary sewer on an as-needed basis (see Photograph 30).

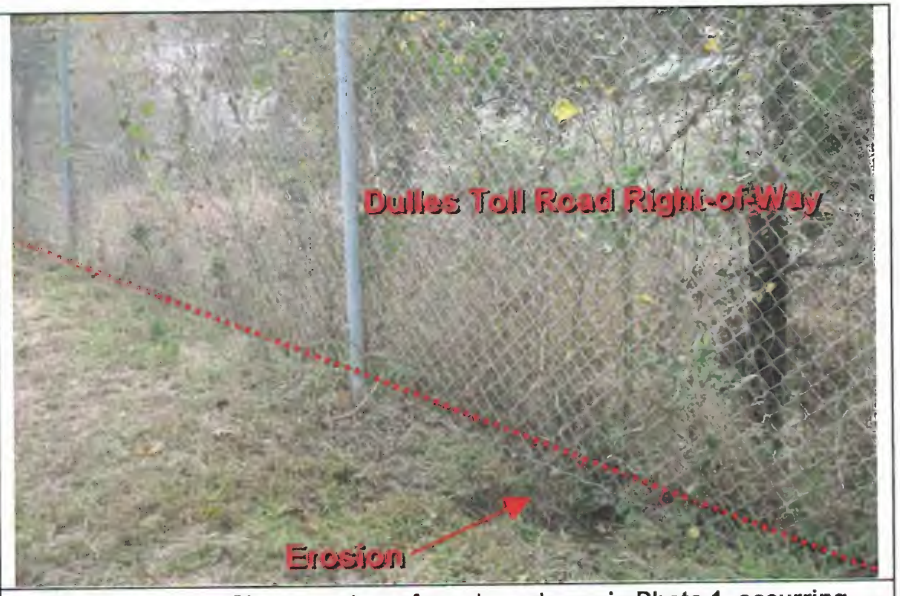
The EPA Inspection Team observed/obtained the following with regard to the Facility:

1. At the time of the inspection a formal plan for addressing stormwater pollution prevention and good housekeeping had not been developed or implemented for the Facility (e.g., Stormwater Pollution Prevention Plan). The VDOT Facility Maintenance Manager explained that contractors are used to perform maintenance and conduct area snow removal activities. He further explained that contractors regularly visit the site to obtain and connect VDOT equipment to their vehicles and had not been trained by VDOT on pollution prevention activities to be followed at the Facility.
2. VDOT Facility staff explained that MS4 training was scheduled for Facility staff the Thursday prior to the EPA Inspection (10/18/2012); however, the training had been canceled. The EPA Inspection Team requested records for the MS4 training and VDOT provided the records in the VDOT Response Inventory (see VDOT Response Inventory Item No. 44C).
3. Facility staff explained that District inspections are conducted annually at the Facility, and that all findings are summarized in a compliance report for the Fairfax area; however, documentation of the inspections was not provided by VDOT to document that the inspections include stormwater pollution prevention. VDOT provided an inspection record for a Facility evaluation conducted by EEE Consulting, Inc. on May 29, 2012, which identified general housekeeping and pollution prevention issues at the Facility, in the VDOT Response Inventory (see VDOT Response Inventory Item No. 45.A).
4. Facility staff explained that they were unaware of a logbook for spills, and that spills may be kept in the facility daily diary. The staff went on to explain that a spill occurred onsite approximately two weeks prior, but later stated the spill occurred at the Merrifield facility.
5. Facility staff explained that the salt pond is regularly drained to the sanitary sewer system; however, documented inspection records are not maintained to assess or document the freeboard in the pond.
6. The VDOT Facility Manager explained that the fuel island is inspected weekly by the District Fueling Coordinator, Mr. Robby Jenkins, and that Mr. Jenkins may not always be present at the facility when fuel tank filling operations occur. Additionally, the Hazardous Material Storage Area is inspected every three to four months by Facility staff.
7. The VDOT Facility Manager explained that vehicle washing is conducted at washing stations inside the vehicle maintenance buildings which, according to VDOT staff are connected to an oil-water separator (OWS) that discharges to the sanitary sewer. The EPA inspection team was told that staff watches facility drainage to determine if maintenance is required on the OWS. The facility will then hire a contractor if maintenance is required.
8. Visible erosion (rill formations) was observed along the southern fence line in the southeastern portion of the Facility, south of salt spreader storage bays 15-23 (see Photographs 1 through 6). Stormwater runoff from the Facility discharges off-site at multiple discharge locations under the southern perimeter fence into the Dulles Toll Road Right-of-Way, north of Westbound Dulles Toll Road.

9. Erosion (rill formations) was observed in an internal drainage swale on the western side of the Facility, north of the asphalt and trash storage area (see Photographs 7 and 8). Evidence of sediment transport from the drainage swale to the west was observed.
10. Sediment and vegetative debris was observed inside a stormwater conveyance channel in the south-central portion of the site (see Photographs 9 and 10). A storm drain inlet located downgradient of the conveyance channel was observed without inlet protection (see Photographs 11 and 12). The EPA Inspection Team observed sediment accumulation inside the stabilized storm drain outlet channel located at the storm drain outlet pipe on the western side of the Facility, adjacent to the asphalt and trash storage area (see Photographs 13 and 14). The outlet pipe is located just upgradient of the western discharge location.
11. Disturbed soil was observed downgradient of a storm drain outlet pipe that discharged off site to the west, adjacent to the asphalt and trash storage area (see Photographs 15, 16, and 17). Silt fence had been implemented between the disturbed soil and the adjacent wetland to the west and evidence of previous sediment-laden surface runoff was observed leading offsite (see Photographs 16 and 18). The silt fence appeared to be newly installed to the EPA Inspection Team.
12. Visible hydraulic fluid, rust, and salt staining was observed underneath a piece of salt dispensing equipment on the northeast portion of the Facility (see Photographs 19 and 20).
13. Visible staining from a petroleum product was observed on the gravel surface, south of the salt dispenser bays along the southern perimeter of the Facility (see Photograph 21).
14. A solid waste disposal dumpster located in the central portion of the Facility was observed actively leaking fluid onto the impervious surface below. Visible staining from unknown fluids was observed on the impervious surface underneath and around the solid waste dumpster (see Photographs 22, 23, and 24).
15. The used oil secondary containment structure located adjacent to the Facility office building on the south side of the maintenance shop, was observed without a plug installed in the secondary containment structure PVC pipe drain, to prevent product transport in the event of a spill or leak (see Photographs 25 and 26).
16. An outside water faucet adjacent to the used oil secondary containment structure was connected. The EPA Inspection Team observed hand washing activities occur at the faucet (see Photograph 27).
17. The liquid magnesium chloride storage tank was equipped with a secondary containment structure. However, an under drain passing through the secondary containment was not plugged to prevent product transport in the event of a spill or leak (see Photograph 28 and 29).

Site Photographs	VDOT MS4 (General Permit No. VAR04) Reston Area Headquarters VDOT District No. 9	Photograph Date: 10/24/2012

Photograph 1 – View facing southeast of a stormwater conveyance ditch along the southern perimeter of the Facility. Note erosion was observed.



Photograph 2 – Close-up view of erosion, shown in Photo 1, occurring under the southern fence, in the southeastern corner of the Facility.

Photograph 3 – Erosion observed off-site in the Dulles Toll Road ROW to the south of the Facility, apparently caused by facility stormwater runoff.

Photograph 4 – View facing west of the stormwater conveyance ditch, shown in Photo 1, along the southern perimeter of the Facility.

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Photograph 5 – View facing east of the stormwater conveyance ditch, shown in Photos 1 and 4, along the southern perimeter of the Facility.

Photograph 6 – Close-up view of a stormwater discharge location in the southeast corner of the Facility. Note the sediment accumulation.

Photograph 7 – View facing east of a stormwater conveyance ditch in the central-west portion of the Facility, adjacent to the asphalt mill stockpile.

Photograph 8 – View facing west of erosion occurring in the stormwater ditch in the central-west portion of the Facility, shown in Photo 7.

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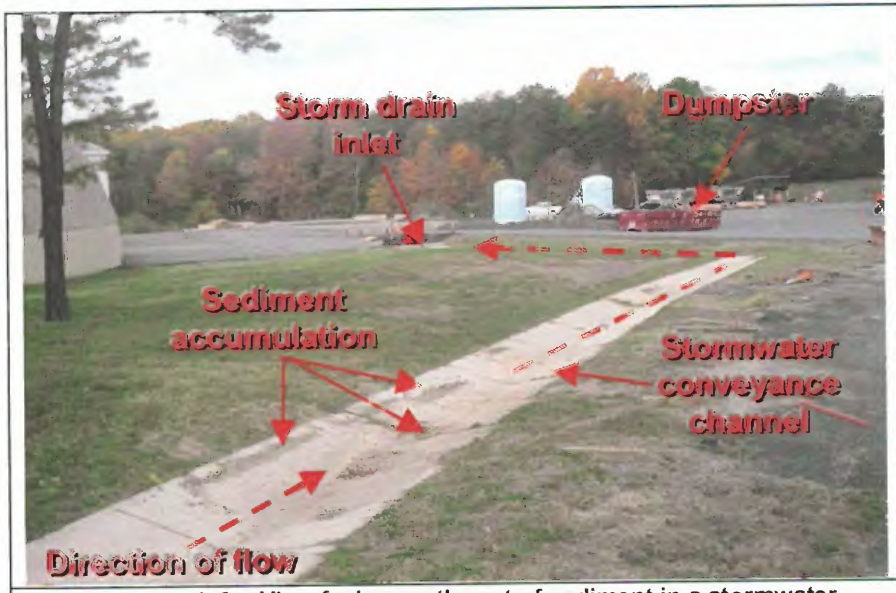
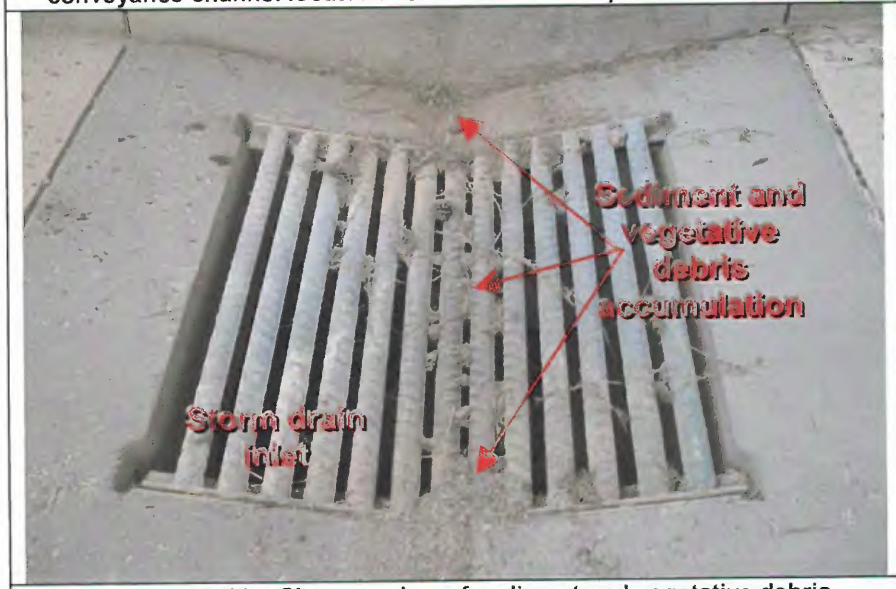


Photograph 9 – View facing northwest of sediment in a stormwater conveyance channel located in the south-central portion of the Facility.

Photograph 10 – View facing southeast of the discharge location for the stormwater conveyance channel shown in Photo 9.



Photograph 11 – Close-up view of sediment and vegetative debris accumulation on the storm drain grate, shown in Photo 10.

Photograph 12 – Close-up view of inside the storm drain inlet shown in Photos 9, 10, and 11.

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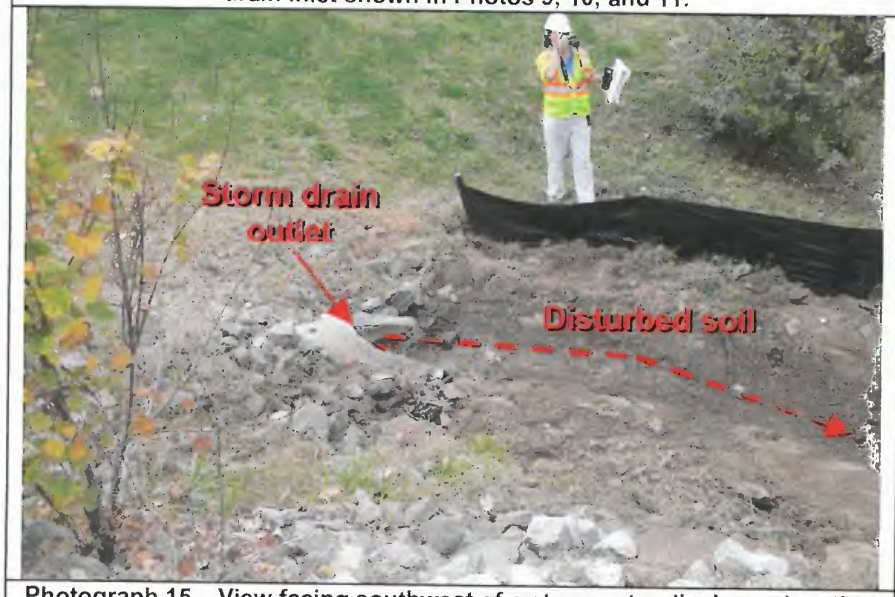
Photograph 13 – View facing east of the discharge location for the storm drain inlet shown in Photos 9, 10, and 11.

Photograph 14 – View facing east of sediment accumulation at the discharge location shown in Photo 13.



Photograph 15 – View facing southwest of a stormwater discharge location in the central-west portion of the Facility. Note the disturbed soil.

Photograph 16 – View facing north of the stormwater discharge location shown in Photo 15. Note the disturbed soils and adjacent wetland.

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Photograph 17 – Close-up view of the stormwater discharge location shown in Photos 15 and 16.

Photograph 18 – View (facing south) of evidence of surface runoff from the stormwater discharge location shown in Photos 15, 16, and 17.

Photograph 19 – View facing north of petroleum product and rust staining on the impervious surface, underneath salt dispensers in the northeast portion of the Facility.

Photograph 20 – View facing north of hydraulic fluid staining on the impervious surface, underneath salt dispensers in the northeast portion of the Facility.

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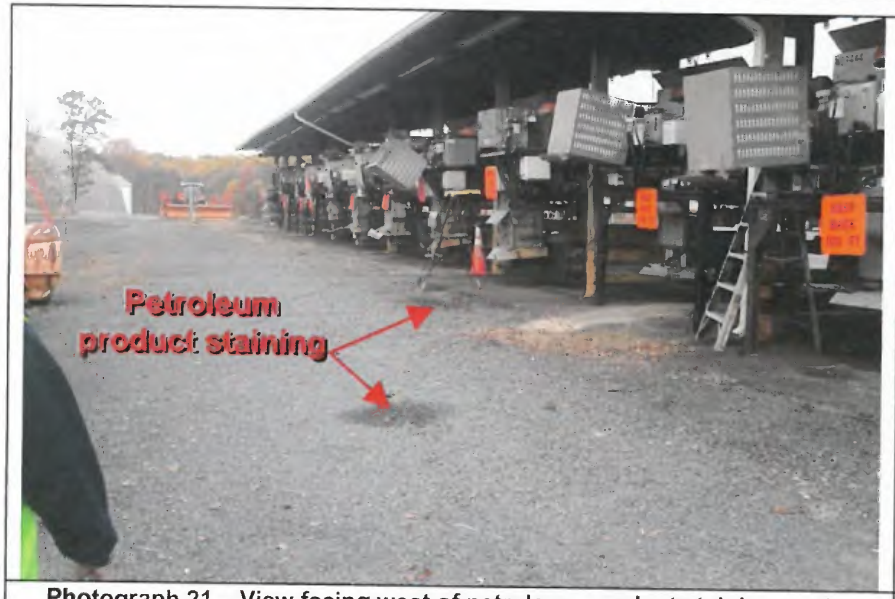

Photograph 21 – View facing west of petroleum product staining on the ground surface, south the salt dispenser bays in the southeast portion of the Facility.

Photograph 22 – View facing west of an uncovered dumpster located in the central portion of the Facility, adjacent to the liquid magnesium storage area. Note the dumpster was leaking fluid onto the impervious surface.

Photograph 23 – Close-up view of evidence of fluid accumulation inside the uncovered dumpster shown in Photo 22.

Photograph 24 – Close-up view of fluid staining on the impervious surface underneath the uncovered dumpster shown in Photos 22 and 23.

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Photograph 25 – View facing north of the used oil secondary containment structure located on the south side of the Facility maintenance shop.

Photograph 26 – View facing northeast of the used oil secondary containment structure drain. Note a plug was not installed in the drain.

Photograph 27 – View facing west of a water faucet located on the south side of the Facility maintenance shop.

Photograph 28 – View facing west of liquid magnesium tank storage area in the central west portion of the Facility.

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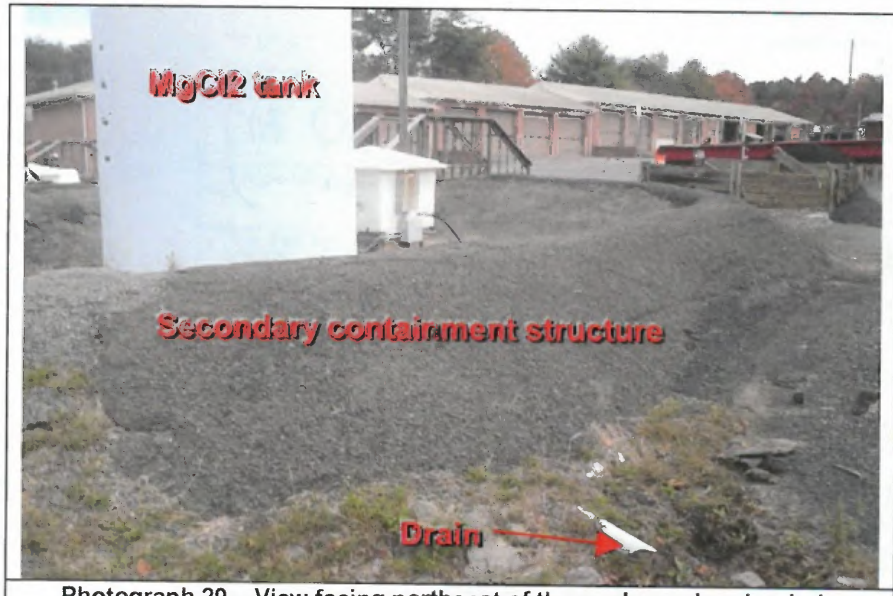

Photograph 29 – View facing northeast of the unplugged under drain leading from the liquid magnesium secondary containment area.

Photograph 30 – View facing northwest of the Facility salt pond located in the southwest corner of the Facility.

Sign-in Sheet	VDOT MS4 (General Permit No. VAR04) Reston Area Headquarters VDOT District No. 9	Site Visit Date: 10/24/2012

MS4 Program Evaluation Sign-In Sheet (Please Print)

Permittee: Reston Area HQ **Date conducted:** 10/24/2012

Permit No.

Name	Title	Company	Department	Phone
Anthony D'Angelo	Inspector	PG Environmental	EPA Contractor	303-279-1778
Pete Gold	Inspector	EPA	NPDES Enforcement	215-814-5236
Lee Hixon	Consultant	EEE	—	540-553-1682
Allison Graham	Inspector	EPA Region 3	NPDES Enforcement	215-814-2373
Larry Humphreys	Maint Manager	VDOT	VDOT	18004 Roads
T Henson	TOTH	VDOT		1703438-3467
Tony Cole	TO II	VDOT		" " "
Morris Walton	Roadmaster	VDOT	Maint.	804 786 0943
Chris Svonson	Consultant	EEE	—	804-492-3330
Mark Kuker	Inspector	PG Environmental	EPA Contractor	703-707-8258 Email
Tracey Harman	WQ Permit Mgr	VDOT	ENV.	(804) 371-6834
Liz Ottinger	Env. Engr.	EPA	NPDES Permits	215-814-5783
[illegible]	HAZMAT MGR	VDOT	HAZMAT	804-786-5533

Sign-in Sheet	VDOT MS4 (General Permit No. VAR04) Reston Area Headquarters VDOT District No. 9	Site Visit Date: 10/24/2012

VDOT

VIRGINIA DEPARTMENT OF TRANSPORTATION
SITE VISIT ATTENDANCE RECORD

Location: Reston Area Headquarters		
Visit Date: 10/24/12	Start Time: 8:	End Time:
Roster Administration Notes:		

	First Name	Last Name	Affiliation (VDOT, EPA, EEE, etc.)	Attendees Signature	Title
1.	Chris	Swenson	EEE		
2.	Morris	Walton	VDOT		Roadmaster
3.	Lee	Hixon	EEE		Consultant
4.	Larry	Hughes	VDOT		MOM
5.	Tom B	Cole	VDOT		TOII
6.	TIM	Henson	VDOT		TOLL
7.	Max	Kuker	EPA Contractor		
8.	Liz	Ottinger	EPA		Env. Engr.
9.	MAGAN	HARPER	Va. DCR		MS4 Permit Writer
10.	Anthony	D'Angelo	EPA Contractor		Inspector
11.	Pete	Gold	EPA		Inspector
12.	Allison	Graham	EPA Region 3		Inspector
13.	Tracey	Norman	VDOT		VSMP Permit Mgr
14.	~~Max~~	~~Kuker~~	~~F~~		
15.	David	Wilson	VDOT		HAZMAT MGR
16.					
17.					
18.					
19.					
20.					